

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT
OF TENNESSEE
WESTERN DIVISION**

IN RE: JOHNNIE RAYMOND CANDY
Debtor.

Case No.: 19-27019
Chapter 7

JOHNNIE RAYMOND CANDY

PLAINTIFF,

VS.

AD.PROC. NO.: 19-

INTERNAL REVENUE SERVICE

DEFENDANT.

COMPLAINT TO DETERMINE DISCHARGEABILITY

COMES NOW the plaintiff, by and through counsel, and moves this Honorable Court to determine dischargeability of student loan debt. In support of this Complaint, the debtor would show:

1. The Debtor filed this instant case on September 4, 2019;
2. This Court has jurisdiction and venue is proper;
3. This is a Court proceeding as it arises out of the bankruptcy case and can exist only in the bankruptcy case;
4. Internal Revenue Service is a creditor of the debtor/plaintiff;
5. After the debtor filed for relief under Chapter 7 of the United States Bankruptcy Code, the Defendant was notified of the filing;
6. The Debtor requests that the Court enter an order to determine the dischargeability of the tax debt in the approximate amount of \$841,735.12;

PREMISES CONSIDERED,

The plaintiff prays that:

1. That service of process issue requiring the defendants to answer the allegations contained herein;
2. That the Court find that the Creditor allow the discharge of the portions of the tax debt that may be allowed for discharge; and
- 3.. For any relief just and proper under the circumstances.

/s/John E. Dunlap
3340 Poplar Avenue, No. 320
Memphis, Tennessee 38111
(901) 320-1603
(901) 320-6914

CERTIFICATE OF SERVICE

On November 26, 2019 a true and correct copy of the foregoing was sent via U.S. Postal Service postage prepaid to the Debtor, 7860 Grove Brook Court, Germantown, TN 38138; Case Trustee, 200 Jefferson, Suite 202, Memphis, TN 38103; IRS, PO Box 7346 Philadelphia, PA 1910; IRS, 167 N. Front, 800 Federal Bldg. 8th Floor, Memphis, TN 38103 and all entities on matrix.

/s/John E. Dunlap